



Dated: June 17, 2015

Respectfully submitted,

Irwin Industrial Tool Company d/b/a Lenox

By: /s/Kevin M. Duddleston

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2015, I electronically filed the foregoing **NOTICE OF WRITTEN SETTLEMENT PROPOSAL** with the Clerk of the Court using the CM/ECF system, which will send electronic notification to:

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